

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

\$34,525.53 in UNITED STATES FUNDS  
from U.S. BANK ACCOUNT No.  
XXXXXX5653, HELD IN THE NAME  
OF A2Z AUTO SALES AND  
FINANCIAL LLC,

Defendant.

NO. C

VERIFIED COMPLAINT FOR  
FORFEITURE IN REM

COMES NOW, the United States of America, by and through Jenny A. Durkan,  
United States Attorney for the Western District of Washington, and Richard E. Cohen,  
Assistant United States Attorney for said District, and alleges:

I.

This is a complaint for the forfeiture in rem of \$34,525.53 in United States funds,  
more or less, and all proceeds therefrom, representing all funds contained in U.S. Bank  
account number XXXXXX5653 ("the defendant funds"), pursuant to 31 U.S.C. §  
5317(c)(2), for violations of 31 U.S.C. § 5324.

///

II.

This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1345, and 28 U.S.C. § 1355.

III.

This Court has venue pursuant to 28 U.S.C. § 1395.

IV.

The defendant funds as described above are now and during the pendency of this action will be in the jurisdiction of this Court.

V.

On December 20, 2010, the Department of Homeland Security-Immigration and Customs Enforcement executed a seizure warrant seeking all funds contained in U.S. Bank account number XXXXXX5653, up to \$271,741.00, pursuant to 31 U.S.C. § 5317(c)(2), for violations of 31 U.S.C. § 5324(a)(1). On December 20, 2010, \$34,525.53 in U.S. funds was seized from the account.

VI.

The facts in support of the forfeiture of the defendant funds are as set forth in the attached Affidavit of Special Agent Lindsay Wills, Immigration and Customs Enforcement, which is incorporated as if fully set forth herein, and is attached hereto as Exhibit "A."

VII.

By reason of the foregoing, the defendant currency is subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2) as property involved in violations of 31 U.S.C. § 5324, or as property traceable to such violations..

///

///

///

///

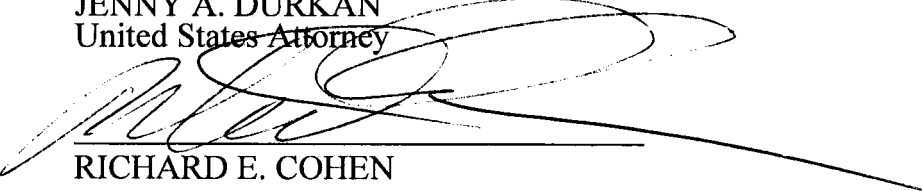
///

1 WHEREFORE, the United States requests that due process issue to enforce the  
2 forfeiture of the defendant funds, that due notice be given to all interested persons to  
3 appear and show cause why forfeiture of the defendant funds should not be decreed, that  
4 the defendant funds be condemned as forfeited to the United States to be disposed of  
5 according to law, and for such other and further relief as the Court may deem just and  
6 proper.

7 DATED this 20th day of December, 2010.

8 Respectfully submitted,

9 JENNY A. DURKAN  
10 United States Attorney

11   
12 RICHARD E. COHEN  
13 Assistant United States Attorney  
14 United States Attorney's Office  
15 700 Stewart Street, Suite 5220  
16 Seattle, Washington 98101-1271  
17 Phone: 206-553-4665  
18 Fax: 206-553-6934  
19 Email: [Richard.E.Cohen@usdoj.gov](mailto:Richard.E.Cohen@usdoj.gov)  
20  
21  
22  
23  
24  
25  
26  
27  
28

VERIFICATION OF COMPLAINT

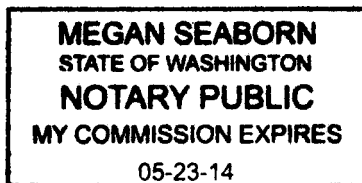
STATE OF WASHINGTON      }  
COUNTY OF KING        }      ss


I, Lindsay Wills, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

I am a Special Agent with the Immigration and Customs Enforcement and am assigned to this case. I have read the attached Complaint and know the contents thereof; I have furnished the information contained in the Complaint based upon my own investigation and that of other reliable official Government sources; and, based on information and belief, the allegations contained in the Complaint are true.

  
Lindsay Wills  
Immigration and Customs Enforcement

SUBSCRIBED and SWORN to before me this 20<sup>th</sup> day of December, 2010, by  
Lindsay Wills.



  
Print: Megan Seaborn  
Notary Public in and for the  
State of Washington, residing  
at Seattle, WA  
Expires: 5/23/14